## Memorandum

Date: 6 December 1983

Subject: EPA Reg. No. 26693-2 KILLMASTER II

Caswell #219AA

In 11-09-83; record no. 109113

From: B. T. Backus

IRB/TSS

To: Mr. Jay Ellenberger

Product Manager 12

Registrant: Positive Formulators, Inc.

1044 North Jerrie Ave. Tucson, AZ '85711

Label declaration: Active Ingredient:

## Background:

The registrant has submitted a primary eye irritation study on this formulation, as was suggested in a review dated of Jan. 7, 1983.

## Comments and Recommendations:

- 1. The eye irritation study received 10-31-83 is adequate and acceptable. The product is in toxicity category III by this exposure route; and with previously accepted data this indicates the appropriate signal word is CAUTION.
- 2. The proposed IF IN EYES statement of practical treatment should be revised to something like:

Immediately flush eyes with plenty of water. Get medical attention if irritation persists.

3. The Hazards to Humans and Domestic Animals statement should be revised to something like the following:

CAUTION. May be Harmful if swallowed or absorbed through skin. May cause eye and skin irritation. Combustible. Do not take internally. Avoid contact with skin, eyes and clothing. Do not apply where children are likely to come in contact with the treated surface until dry. Wear rubberized gloves during application. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Avoid breathing vapors. Keep away from food, feedstuffs, and domestic water supplies. Keep container closed. Avoid contact with treated surfaces until dry.

4. We would prefer that the note to physician be revised to something like the following:

Chlorpyrifos is a cholinesterase inhibitor. Atropine only by injection is antidotal if symptoms of cholinesterase inhibition are present. Product contains petroleum solvents and may present an aspiration hazard.

## Review:

The following study was conducted on the product formulation at Hill Top Research, Inc. P.O. Box 42501, Cincinnati, OH 45242. Study was received 10-31-83, and is in Acc. 251852.

1. Primary eye irritation - rabbit. Hill Top Research Project No. 83-1128-21; dated 9-2-83.

Procedure: 0.1 ml was applied to one eye of each of 6 NZ white rabbits, with no subsequent eye wash.

Results: Corneal opacity in 2/6 rabbits at 24 hrs. Some conjunctival irritation in all six rabbits through day 4. All eyes clear by day 7.

Study Classification: Core Minimum Data

Product Classification: Tox. Cat. III

12-06-83

Byron T. Backus IRB/TSS